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Remarks/Arguments

In section 4 of the Detailed Action, all of claims 1 to 25 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Goodrich et al. US Patent 7,111,018 (hereinafter Goodrich) in view of the Siemens document "Power System Simulator for Operations" (hereinafter Siemens), in further view of Bjorklund US Patent 7,062,359 (hereinafter Bjorklund). This rejection is respectfully traversed, for at least the following reasons.

For the avoidance of any doubt, the applicant wishes to stress that claim 1 refers clearly to both "the topology of the power system" and to "the sequencing for startup or shutdown of the plurality of power supplies". These are distinct and different, as is made clear throughout the description and claims. The topology refers to the physical connections among the power supplies. Sequencing refers to an order in which the power supplies are started up or shutdown. For example, Figs. 10 and 11 both show the same topology of the power system, but they show different sequencing of the power supplies.

Claim 1 recites displaying of a graphical display representing the topology of the power system. Such a graphical display is disclosed by each of the applied references, as noted in the Detailed Action. Claim 1 also recites displaying of a graphical display "representing the sequencing for startup or shutdown of the plurality of power supplies". This is not disclosed or suggested by, or obvious from, any of the applied references.

More specifically, claim 1 recites, among other things, the following three steps:
"receiving user input information to determine sequencing for startup or shutdown of the plurality of power supplies;

displaying on the display device a graphical display representing the sequencing of the plurality of power supplies; and

producing said configuration information for the control apparatus consistent with the displayed topology and sequencing of the plurality of power supplies".

These steps are not disclosed or suggested, or rendered obvious, by any of Goodrich, Siemens, and Bjorklund, either alone or in any combination.

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With respect to Goodrich, this is recognized and acknowledged in Section 4 of the Detailed Action by the statements that "Goodrich does not expressly teach" the above steps of displaying and producing, and that "Goodrich in view of Siemens do not expressly teach" the above step of receiving user input information.

The "Response to Arguments" part of the Detailed Action contends that "Applicant argues that Goodrich does not disclose an interface to present configuration information to a power system (See page 6, bottom) but provides no evidence as to why the applicant believes the feature is missing. In contrast, the Examiner notes that ... The GUI allows the user to see in a graphical form the configuration of a given circuit, ...". The "configuration" that Goodrich's GUI displays is the topology of the power system, and has nothing to do with sequencing of the power supplies as recited in claim 1. The claim 1 step of "producing said configuration information for the control apparatus consistent with the displayed topology and sequencing of the plurality of power supplies" (underlining added) is not met by Goodrich because there is no displayed sequencing for any configuration information to be consistent with.

Siemens does not disclose or suggest the above step of receiving user input information, as recognized and acknowledged in Section 4 of the Detailed Action by the statement that "Goodrich in view of Siemens do not expressly teach" this step.

Siemens also does not disclose the step recited in claim 1 of "displaying on the display device a graphical display representing the sequencing of the plurality of power supplies". In this respect the Detailed Action refers to page 7 of Siemens. This page is a diagram which shows a topology of a power system, and a prevailing (whether actual or simulated) state of the power system. It does not show any information "representing the sequencing for startup or shutdown of the plurality of power supplies" as recited in claim 1.

The Detailed Action further contends "Siemens also shows a topology diagram and on the state diagram and after running through the sequence operation the diagram displays information depicting the sequenced power circuits as well as the configuration information that is consistent with the displayed topology.". There is a distinct and clear difference between displaying "a graphical display representing the sequencing of the plurality of power supplies", as recited in

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claim 1, and displaying a topology and state diagram of a power system (whether or not this is after sequencing as recited in claim 1), as disclosed by Siemens. Siemens does not display any sequencing.

Further, Siemens does not disclose the claim 1 step of "producing said configuration information for the control apparatus consistent with the displayed topology and sequencing of the plurality of power supplies". There is no disclosure or suggestion in Siemens of any such configuration information.

In the "Response to Arguments" part of the Detailed Action it is contended that "a recitation of the intended use of the claimed invention must result in a structural difference between the claimed invention and the prior art ... If the prior art structure is capable of performing the intended use, then it meets the claim.". It is respectfully submitted that this overlooks the facts that the claims are directed to a method and recite steps of the method. For the prior art to meet the claim, the steps of the method must be disclosed by the prior art. In this case, they are not.

However, the applicant notes the comment that "In the above new rejection, the examiner has made clear in the interpretation that while the Siemens reference does teach the ability to turn machines on an [sic] off it does not specifically recite a process of user input specifying information determining the sequencing of the startup or shutdown of the power supplies and modifies the reference with Bjorklund to teach the missing information.".

As noted above, Siemens also does not teach any graphical display of sequencing information, or producing configuration information consistent with such sequencing, as required by claim 1. Even if Siemens' system can provide for turning on and off devices - and this is not conceded because Siemens only describes a simulator, not a control system - there is no disclosure or suggestion in Siemens of any sequencing for startup or shutdown of the power supplies or of producing configuration information consistent therewith. The "Activity Sequence Control" referred to in Siemens' short circuit analysis appears to relate to something entirely different, and does not relate to sequencing power supplies for startup or shutdown as recited in claim 1.

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As recognized in the Detailed Action, Bjorklund discloses a process 1 with circuit apparatus to control power flow in different ways, such as stopping, starting, regulating, reducing and reversing power flow, in a power substation, via communications channels and a human/machine interface which may include a graphical display. As stated at column 11, lines 41 et seq. the interface "is equipped with schematic graphical representations of transmissions lines such that real time values may be displayed on request ... so displaying actual real-time electrical or other values (eg temperatures) for parts or components of the lines. The display may also represent in more detail actual circuits. Again using the schematic graphical representations of circuits real time values may be displayed, on request, for parts, lines or components of said circuits.".

Again, there is no disclosure or suggestion in Bjorklund of the claim 1 step of "receiving user input information to determine sequencing for startup or shutdown of the plurality of power supplies". While Bjorklund discloses control of parts of the process 1, and selection of icons on a topological display for example to monitor real-time values, there is no disclosure or suggestion of any sequencing for startup or shutdown of a plurality of power supplies.

Similarly, there is no disclosure or suggestion in Bjorklund of the claim 1 step of "displaying on the display device a graphical display representing the sequencing of the plurality of power supplies". Bjorklund only discloses a graphical display of transmissions lines and actual circuits, i.e. the topology of the system, and associated values. Bjorklund does not describe any sequencing, nor any graphical display representing sequencing, as recited in claim 1.

Further, although Bjorklund discloses control information for the process 1, it does not disclose producing configuration information for the control apparatus consistent with the displayed topology and sequencing of the plurality of power supplies, because there is no disclosure of any such sequencing.

For at least the above reasons, none of the steps of claim 1 of:

"receiving user input information to determine sequencing for startup or shutdown of the plurality of power supplies;

displaying on the display device a graphical display representing the sequencing of the

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plurality of power supplies; and

       producing said configuration information for the control apparatus consistent with the displayed topology and sequencing of the plurality of power supplies"
is disclosed or suggested by, or rendered obvious over, any of Goodrich, Siemens, and Bjorklund, when taken either individually or in any combination.

       Accordingly, it is respectfully submitted that claim 1 is not unpatentable over these references.

       Similar remarks apply to each of the independent claims 18 and 19, and similar differences apply between the methods as recited in these claims and the disclosures of Goodrich, Siemens, and Bjorklund. For substantially the same reasons, each of claims 18 and 19 is also not unpatentable over these references individually or in any combination.

       The dependent claims 2-17 and 20-25 are also not unpatentable over the applied references for the same reasons in view of their dependencies, as well as their own recitals of further features that are not disclosed or suggested by Goodrich, Siemens, or Bjorklund.

       In particular, for example, each of dependent claims 5 to 11 and 22 to 24 recites particular features of representing the sequencing of power supplies, which are not disclosed or suggested by Goodrich, Siemens, or Bjorklund. In this respect the Detailed Action refers to Figs. 22-29 of Goodrich. However, as clearly described in Goodrich at column 14, lines 20-44, these illustrate the hierarchy of the power systems equipment, and they do not represent any sequencing for startup or shutdown as required by these claims.

       The Detailed Action further refers to Siemens as showing "arrows representing the sequencing (See page 7) e.g. - 376mv to pacific". The symbols used in this figure of Siemens appear not to be explained therein. They appear to relate to power flows, but in any event they do not represent any sequencing as recited in the claims of this application.

       With respect to the comments in the Detailed Action referring to claim 14, it is observed that "sequencing for the flow of current through the circuit", whatever that refers to, is not sequencing for startup or shutdown of the plurality of power supplies as recited in the present

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claims. There is nothing in the applied references that discloses, suggests, or makes obvious the sequencing for startup or shutdown as recited in the claims of this application.
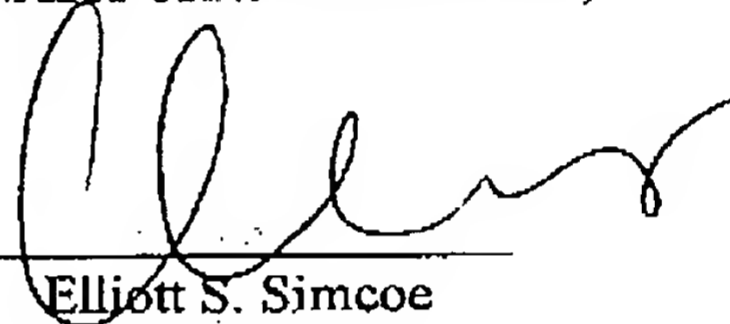
For at least the above reasons, it is respectfully submitted that all of claims 1-25 of this application clearly and patentably distinguish the invention from the applied references, and are allowable.

The Applicant therefore respectfully requests reconsideration of this application, and consequent issue of a timely Notice of Allowance.

Respectfully submitted,

AVINASH CHIDAMBARAM, ET AL

By _____
Elliott S. Simcoe
Reg. No. 50,010
Tel.: (613) 232-2486

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ESS/RJH/wfs

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